

1      **BARRACK, RODOS & BACINE**

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12     **UNITED STATES BANKRUPTCY COURT**  
13     **NORTHERN DISTRICT OF CALIFORNIA**  
14     **SAN FRANCISCO DIVISION**

15     In re:

16     PG&E CORPORATION

17     - and -

18     PACIFIC GAS AND ELECTRIC  
19     COMPANY,

20     Debtors.

21      Affects Both Debtors  
22      Affects PG&E Corporation  
23      Affects Pacific Gas and Electric  
24     Company

25     Case No. 19-30088 (DM) (Lead Case)

26     Chapter 11

27     (Jointly Administered)

28     **JOINDER OF IOWA PUBLIC EMPLOYEES'**  
29     **RETIREMENT SYSTEM TO SECURITIES**  
30     **LEAD PLAINTIFF'S OBJECTION TO**  
31     **REORGANIZED DEBTORS' MOTION TO**  
32     **APPROVE SECURITIES ADR AND**  
33     **RELATED PROCEDURES FOR**  
34     **RESOLVING SUBORDINATED**  
35     **SECURITIES CLAIMS [D.I. 9189]**

Iowa Public Employees' Retirement System, the holder of a Securities Claim<sup>1</sup> and a creditor in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities ADR Objection**”), in opposition to *Reorganized Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the “**Securities ADR Motion**”). In support of this Joinder, Iowa Public Employees’ Retirement System, respectfully states as follows:

#### **JOINDER AND RESERVATION OF RIGHTS**

1. Iowa Public Employees’ Retirement System is a Securities Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. W#BKW27423 and NJD!\$27423).

2. Iowa Public Employees’ Retirement System incorporates by reference and hereby joins in all arguments set forth in the Securities ADR Objection.

3. Iowa Public Employees’ Retirement System reserves its right to supplement this Joinder and further reserves its rights to participate in any hearing to consider the Securities ADR Motion, including its rights to make any arguments and to examine witnesses.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as applicable.

## **CONCLUSION**

For all of the foregoing reasons, Iowa Public Employees' Retirement System respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

# **BARRACK, RODOS & BACINE**

By: /s/ Samuel M. Ward

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JOINDER OF IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM TO SECURITIES  
LEAD P'S OBJ TO REORGANIZED DEBTORS' MOT TO APPROVE SECURITIES ADR  
Case No. 19-30088 (DM) (Lead Case)